

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

DOUGLAS I. HORNSBY, Administrator
of the Estate of CYNTHIA GARY,
Plaintiff,

-vs- Case No. 2:22-cv-427
UNITED STATES of AMERICA, et al.,
Defendants.

DEPOSITION TAKEN OF DOUGLAS HELMS

December 10, 2024 - 10:00 a.m.

APPEARANCES: RULOFF, SWAIN, HADDAD, MORECOCK,
TALBERT & WOODWARD, P.C.
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Virginia Beach, Virginia 23451
Representing the Plaintiff.

UNITED STATES OF AMERICA.
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and Shaun M. Pehl, Esquire.
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Representing NASSCO-Norfolk.
WOODS ROGERS VANDEVENTER, PLC.
Jennifer L. Eaton, Esquire.
101 West Main Street, Suite 500.
Representing Advanced Integrated Technologies,
LLC.

Job No. CS7052771

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1 Deposition upon oral examination of
2 DOUGLAS HELMS, taken before Marie W. Lawson, a Notary Public
3 in and for the Commonwealth of Virginia at Large, pursuant to
4 notice and agreement, commencing at 10:00, a.m., on December
5 10, 2024, in the law offices of Woods Rogers Vandeventer,
6 PLC., 101 West Main Street, Suite 500, Norfolk, Virginia;
7 and this in accordance with the Rules of the Supreme Court of
8 Virginia, 1950, as amended.

9
10 ----oOo----

11
12 DOUGLAS HELMS, having been first duly sworn,
13 was examined and testified as follows:

14
15
16 MR. BRUGH: Malinda, we get started, the
17 attorneys have agreed that we'll have normal stipulations on
18 this, which is one objection by one of the parties is good
19 for all parties and only objections as to form for this
20 deposition, all others are reserved for trial.

21
22
23
24 DIRECT EXAMINATION BY MS. LAWRENCE:

25 Q Good morning, Mr. Helms.

1 BY MS. LAWRENCE:

2 Q So the companies that do the work is what
3 you're talking about and that bring you the WAF's, that you
4 mentioned, are those subcontractors of NASSCO?

5 A Yes. Some of them.

6 Q Okay. Well, let me ask you this. Who in the
7 WAF-- Well, why don't we do this, back up a minute and just
8 give me an overview. You're the WAF coordinator. Describe
9 the WAF coordination process. Describe for me this process
10 that you are coordinating as the WAF coordinator.

11 MR. BRUGH: And I take it we're now talking
12 about the time frame of the USS MCFAUL. Not any earlier time
13 frame, just the MCFAUL.

14 MS. LAWRENCE: Yes. On the MCFAUL.

15 THE WITNESS: Okay. I would go to the
16 trailer in the morning, check my email, and if anybody sent
17 me any WAF's through email I would print them out. Also--

18

19 BY MS. LAWRENCE:

20 Q Let me stop you there. You said if anybody
21 sent me any WAF's. Who would send you the WAF'S? Where were
22 they coming from? Are these NASSCO's employees or where are
23 they coming to you from?

24 A Could be NASSCO. Could be other repair
25 activities.

1 Q Okay. Got it.

2 A Because as part of the project they would
3 have my email and my phone number.

4 Q Got it.

5 A I would go to the ship at, approximately,
6 7:30 and from there if there's anybody waiting in line,
7 sometimes there was, sometimes there wasn't, I would take new
8 WAF'S, I would get my copies, stamp them, and stamp them
9 original, so that way we would know this is the original WAF,
10 and then I would route these to the EDO. Most of the time
11 it's the EDO, Engineering Duty Officer. I may not get it to
12 them until after they do their turnover. They start
13 reviewing, looking at them, and some of them may go, "We've
14 got to wait on this. We've got to wait on this", or they'll
15 say, "I'll get somebody working on this one", you know. I'll
16 take them back, put them in my binder, number them, enter
17 them in my data base, and now I might have WAF'S from
18 yesterday that he gave them. I might want to go and check
19 ESOMS to see if they built any tag-outs for these WAF'S. If
20 they did I can call up the RA's, Repair Activities, and say,
21 "Hey, you can come, you know, let's try and get your WAF
22 authorized. I need you to be here".

23 Q Okay.

24 A And then I could spend my time, you know,
25 trying to look at my books or talking to the ship to say,

1 "Hey, are you going to have anybody if this guy comes
2 overcome, because they'll hang the tags". So that's part of
3 the coordination of coordinating what we're doing.

4 Q Okay. So when you get the WAF--

5 A I get it.

6 Q --would it be printed out or was it emailed to
7 you and you print it out? Can you explain that process.
8 Like what's hard copy? What's in the computer?

9 A It could be either way. They could email it
10 to me and I'll print it out and I review it, you know,
11 looking at everything to make sure they've got everything in
12 the right blocks on the WAF, and then I could take it to the
13 ship with me. Because there's no printer for me on the
14 ship. Yeah. I got the trailer. Or they could walk it right
15 to me. Again, we have to look at it together and say,
16 "Okay. That looks good", or we might say, "You might want
17 to rewrite this". Some of them are handwritten, some of them
18 are typed, and if it's a good WAF I start my process of stamp
19 it, number it, and ongoing.

20 Q Okay. So did you wind up with like a paper
21 WAF form for every WAF?

22 A Yes. I had a blank.

23 Q Okay. Well, that was my next question. If
24 you keep them, how did you keep them?

25 A I would keep them in a binder and the binder

1 because they say WAFCOR at the end.

2 Q Right. The WAFCOR of the Lead Maintenance
3 Activity?

4 A Yeah. I'm the WAFCOR of the availability.

5 Q Got it. And it references 009-106 of 2.1, so
6 if you look back at 2.1 it says on the page that 2.1 is
7 Standard Items. Would that be the NAVSEA Standard Item like
8 the one that we're looking at?

9 A Yes.

10 Q Okay. If you can just look down at Paragraph
11 3.1.4.2 it says, "The Repair Activity (RA) responsible for
12 the work must accomplish the requirements of 2.4 and complete
13 blocks 1, 2 and 4 through 10 of the WAF and submit to the
14 WAFCOR". Did I read that correctly?

15 MS. EATON: Object to the form.

16 THE WITNESS: Yes.

17

18 BY MS. LAWRENCE:

19 Q And does that describe the WAF process that
20 you were describing for us, that the Repair Activity would
21 complete blocks on the WAF, the Work Authorization Form, and
22 submit them to the WAFCOR, which was you?

23 MR. BRUGH: Objection.

24 THE WITNESS: Yes.

25